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Attorneys for Plaintiff  
JOVITA C. SALVADOR

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JOVITA C. SALVADOR,

Plaintiff,

v.

CAPITAL ONE, INC., CAPITAL ONE  
FINANCE, INC. NORDSTROM, INC.,  
WELLS FARGO HOME MORTGAGE, and  
EQUIFAX CREDIT INFORMATION  
SERVICES,

Defendants.

No. 2:15-CV-01200-APG-NJK

**STIPULATION TO EXTEND TIME  
FOR DEFENDANT NORDSTROM fsb  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT  
(THIRD REQUEST)**

Complaint Filed:	June 24, 2015
Trial Date:	None
Initial Response Date:	November 13, 2015
Third Request Response Date:	February 12, 2016

1 Plaintiff JOVITA C. SALVADOR (“Plaintiff”) and Defendant NORDSTROM fsb  
2 (erroneously sued as NORDSTROM, INC.) (“Defendant”), by and through their respective  
3 counsel of record, submit this Stipulation, Third Request, pursuant to U.S. District Court,  
4 Nevada Civil Local Rule 6-1(a) to extend Defendant’s time to file a responsive pleading to  
5 Plaintiff’s Complaint as follows:

6 1. Plaintiff’s Complaint was filed on June 24, 2015.

7 2. Defendant was served on October 23, 2015, with Defendant’s responsive  
8 pleading due on November 13, 2015.

9 3. Plaintiff and Defendant met and conferred on November 13, 2015, and agreed to  
10 extend Defendant’s time to file a responsive pleading to Plaintiff’s Complaint to December 13,  
11 2015 (First Request) so that they could research their file and records and engage in settlement  
12 negotiations.

13 4. Plaintiff and Defendant met and conferred on December 12, 2015. Counsel for  
14 the Parties engaged in extensive settlement negotiations regarding this matter and agreed to  
15 extend Defendant’s time to file a responsive pleading to Plaintiff’s Complaint to January 12,  
16 2016 (Second Request) so that further research could be conducted.

17 5. Plaintiff and Defendant subsequently met and conferred on January 11, 2016,  
18 and engaged in additional settlement negotiations and both agree that further research of their  
19 files and records is necessary in order to obtain an early resolution of this file. Plaintiff has  
20 agreed to extend Defendant’s time to file a responsive pleading to Plaintiff’s Complaint to  
21 February 12, 2016.

22 6. This Stipulation is made in good faith and based on the parties’ hope that the  
23 additional extension of time will allow the parties to continue to negotiate, and potentially  
24 reach an early resolution of this matter.

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1           7.       The new deadline does not alter the date of any hearing.

2           IT IS SO STIPULATED AND AGREED:

3       DATED: January 12, 2015

BURNHAM BROWN

4  
5                   /s/ Lynn Rivera

LYNN RIVERA

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Telephone: 775-398-3065

8                   Attorneys for Defendant

9                   NORDSTROM fsb (erroneously sued as  
10                  NORDSTROM, INC.)

11       DATED: January 12, 2015

KAZEROUNI LAW GROUP, APC

12                   /s/ Michael Kind

MICHAEL KIND

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16                  Attorneys for Plaintiff

JOVITA C. SALVADOR

18                  IT IS SO ORDERED:

19  
20       DATED: January 12, 2016



UNITED STATES DISTRICT JUDGE

21       4828-9832-2220, v. 1